



## Department of Energy

Office of Science  
Brookhaven Site Office  
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May 4, 2021

Ms. Sharon Hartzell  
Federal Facilities Section  
U.S. EPA - Region II  
290 Broadway - 18<sup>th</sup> Floor  
New York, New York 10007-1866

Mr. Brian Jankauskas  
New York State Department of  
Environmental Conservation  
Division of Environmental Remediation  
625 Broadway -12<sup>th</sup> Floor  
Albany, New York 12233

Dear Ms. Hartzell and Mr. Jankauskas:

**SUBJECT: BROOKHAVEN NATIONAL LABORATORY INTERAGENCY AGREEMENT (IAG) PLANNED REGULATORY APPROACH FOR MANAGEMENT OF PER- AND POLYFLUOROALKYL SUBSTANCES (PFAS) AND 1,4-DIOXANE REMEDIATION**

**Reference:** Letter from S. Hartzell, EPA, to R. Gordon, BHSO, Subject: Justification for Proposed PFOS/PFOA and 1,4-Dioxane Areas of Concern, dated March 22, 2021

This is in response to the above-referenced letter regarding the Environmental Protection Agency's review of Brookhaven Science Associates and Department of Energy's recommended addition of two new Areas of Concern (AOC) and an Operable Unit (OU) to address perfluorooctane sulfonate (PFOS), perfluorooctanoic acid (PFOA) and 1,4-dioxane contamination at Brookhaven National Laboratory (BNL).

We believe the establishment of one OU and issuance of one Record of Decision (ROD) is the most efficient and expeditious way to proceed to address these AOCs. The Time Critical Removal Action (TCRA) currently being implemented downgradient of the current and former Firehouses will address the most significant areas of PFOS and PFOA groundwater contamination at the BNL site. Previous characterization efforts (including PFAS Phase 4) along with the TCRA characterization work will significantly reduce the scope of the remaining Remedial Investigation (RI) work. Therefore, the RI characterization work will focus on filling data gaps in the distribution of PFOS, PFOA and 1,4-dioxane contamination in on-site and off-site groundwater, and in the characterization of PFAS in source area soils.

We expect that the RI characterization will be performed concurrently so as not to delay issuance of the RI Report, Feasibility Study, and subsequent ROD. While a single ROD will address remedial decisions for PFOS, PFOA, and 1,4-dioxane, the actual implementation of the remedies, as needed, may require a phased approach over several years. This phased approach is consistent with the process used to implement the OU III ROD and depends on factors such as risk to receptors, implementability, (including the availability of contractor support, equipment, and materials) and cost/funding. Implementation of the remedies will be determined in the Remedial Design and Remedial Action Work Plans.

As requested, we revised the attached Justification for Proposed PFOS/PFOA and 1,4-Dioxane Areas of Concern document to include individual figures with data for each PFAS sub-AOC and the 1,4-dioxane AOC. We also updated the Impacts to the Environment portions of the document to reflect the characterization efforts conducted to date. Furthermore, this revised document will be added to the Administrative Record because it documents the technical basis for the new AOCs and OU.

If you have any questions please contact Jerry Granzen, of my staff, at (631) 344-4089.

Sincerely,

Robert P. Gordon  
Site Manager

Attachment: BNL Regulatory Approach Justification

cc:	J. Swartwout, NYSDEC	D. Pocze, EPA
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